

### **REMARKS/ARGUMENTS**

Prior to entry of this amendment, the application included claims 1-41. No claims have been amended, canceled, or added. Hence, after entry of this Amendment, claims 1-41 stand pending for examination.

Claims 15-28 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Claims 1, 7-15, 18, 19, 21-34 and 38-41 stand rejected under 35 U.S.C. § 102(b) as being anticipated by the cited portions of U.S. Patent Publication No. 2002/0032687 to Huff (“Huff”).

Claims 2 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Huff in view of the cited portions of U.S. Patent No. 4,501,559 to Griswold et al. (“Griswold”).

Claims 3-6, 17, 20, 35 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Huff in view of the cited portions of U.S. Patent No. 6,389,429 to Kane et al. (“Kane”).

#### **Rejections Under 35 U.S.C. § 112**

The Applicants respectfully traverse the 35 U.S.C. § 112 rejection of claim 15. The Office Action appears to suggest a flawed connection among the programming of the host computer system, introduced by the “wherein the host computer system is programmed to . . .” clause, and the “means for sending . . .” and “means for receiving . . .” claim elements. The Office Action does not, however, provide any rationale for suggesting that the wherein clause necessarily modifies the “means for” elements. Hence, the rejection does not fall within the scope of the law as established in the cited cases, and the Applicants believe the rejection is improper.

## **Rejections Under 35 U.S.C. § 102**

The Applicants respectfully traverse the claim rejections under 35 U.S.C. § 102. The cited reference does not teach each and every claim element, either expressly or implied, as required for a proper rejection under 35 U.S.C. § 102. Specifically, Huff does not teach “identifying pairs of records having similar data; [and] for each identified pair of individual node records, comparing related individual node records and deciding based on predetermined criteria whether the identified pair of individual node records represent the same person.” In other words, node records that are *related to* pairs of records having similar data are compared. *Predetermined criteria* is then used to determine whether the original records represent the same person. Huff does not teach comparing related node records and using predetermined criteria to assess pairs of records having similar data. Hence, claim 1 is believed to be allowable, at least for this reason. Claim 15 includes a similar element and is believed to be allowable, at least for the foregoing reason.

The Applicants maintain that claim 39 is allowable. Claim 39 recites “perform a relationship analysis to infer relationships among persona records using the assertions of the persona records; if a relationship is inferred, assign at least one relationship type to the relationship between the records.” The Response to Arguments section of the pending Office Action cites Huff at ¶¶[0164] and [0098] for this teaching, but at ¶[0164], Huff discusses checks that take place prior to deleting a record by replacing it with another. This is not inferring a relationship between the records. At ¶[0098], there is no reference to the relationship inferred in the above process (¶[0164]), so anything that takes place as described in ¶[0098] is not based on whether the relationship is inferred. Hence, claim 39 is believed to be allowable, at least for this reason. Claim 29 includes a similar element and is believed to be allowable, at least for the foregoing reasons.

The remaining claims depend from one of the independent claims discussed above and are believed to be allowable, at least for the reasons stated above.

## **Conclusion**

In view of the foregoing, the Applicants believe all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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